

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MASSACHUSETTS

In Re:	)	
	)	
CHARLES P. JORDAN, and	)	
MARIA P. JORDAN	)	
Debtors	)	
	)	CHAPTER 7
	)	No. 10-20473-FJB
	)	
CITIBANK, N.A. AS TRUSTEE	)	
FOR CDMC MORTGAGE PASS	)	
THROUGH CERTIFICATES,	)	
SERIES 2003-9	)	
	)	
v.	)	
	)	
CHARLES P. JORDAN, and	)	
MARIA P. JORDAN	)	
	)	

DEBTORS' OPPOSITION TO CITIBANK, N.A. AS TRUSTEE  
FOR CDMC MORTGAGE PASS THROUGH CERTIFICATES,  
SERIES 2003-9 MOTION FOR ORDER LIFTING AUTOMATIC STAY

In Opposition to the CitiBank, N.A., as Trustee for CDMC Mortgage Pass-Through Certificates Series 2009 ("Movant") Motion for Relief from Stay, Debtors respond as follows:

1. Admits
2. Admits
3. Admits
4. Denied as to Movant being the current holder of the first mortgage in the amount of \$738,750.00, Admits as to being recorded with the Essex County (Southern District) Registry

of Deeds at Book 21701, Page 194, along with a modification agreement at Book 27979, Page 345.

5. Denied as to currently securing the Note previously given to PHH as the originator of the mortgage. Movant has never proffered the original Note, and thus has not established its standing in this matter. Debtors will object to Movant's proof of claim.

6. Denied.

7. Admits

8. Admits

9. Debtors are without sufficient information to respond, and therefore deny and call upon Movant to so prove.

10. Debtors are without sufficient information to respond, and therefore deny and call upon Movant to so prove.

11. Debtor is without sufficient information to respond, as the "market analysis" was "performed by LPS (Lender Processing Services) a default servicer hired by Movant and therefore biased, accordingly Debtors deny and wish to seek another opinion of value.

12. Debtors are without sufficient information to respond, and therefore deny and call upon Movant to so prove.

13. Debtors are without sufficient information to respond, and therefore deny and call upon Movant to so prove.

**WHEREFORE**, Debtors request that Movant's Motion for Relief from Stay be denied, and that they be awarded costs incurred in opposing said Motion. Debtor's counsel respectfully requests that

he be allowed 10 days to submit an affidavit of fees and costs incurred.

Charles P. Jordan  
Maria P. Jordan  
by their Attorney

/s/Glenn F. Russell, Jr  
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